## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

.

APPLICATION OF MCF COMMUNICATIONS

DOCKET NO. 345

bg, INC. AND CELLCO PARTNERSHIP D/B/A

VERIZON WIRELESS FOR A CERTIFICATE

OF ENVIRONMENTAL COMPATIBILITY AND

PUBLIC NEED FOR THE CONSTRUCTION,

MAINTENANCE AND OPERATION OF A

WIRELESS TELECOMMUNICATIONS

FACILITY OFF EXETER DRIVE, STERLING,

CONNECTICUT

NOVEMBER 29, 2007

# PRE-HEARING SUBMISSION OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

MCF Communications bg, Inc. ("MCF") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant") hereby provide the Connecticut Siting Council ("Council") with the following pre-hearing information available at this time regarding the above-referenced Application.

### A. <u>List of Witnesses</u>

Sandy M. Carter, Regulatory Manager, Cellco Partnership

Alejandro Restrepo, Radio Frequency Engineer, Cellco Partnership

Brad Gannon, MCF Communications bg, Inc.

Rodney A. Bascom, P.E., Clough Harbour & Associates LLP

Jeffrey R. Shamas, Senior Environmental Program Manager, Kleinfelder, Inc.

These witnesses will testify as to all matters covered in the Application and exhibits.

#### B. Exhibits to be offered

MCF and Cellco intend, at this time, to offer the following Exhibits:

- Application for a Certificate of Environmental Compatibility and Public Need filed by MCF and Cellco dated August 24, 2007, including attachments and the following bulk file exhibits:
  - a. Sterling Zoning Regulations and map;
  - b. Sterling Plan of Conservation and Development;
  - c. Sterling Inland Wetlands and Watercourses Regulations; and
  - MCF's "Technical Report" dated July 13, 2007, filed with the Town of Sterling.
- 2. Affidavit of Publication submitted to the Council on September 4, 2007, from the *Norwich Bulletin*.
- Applicant's Responses to Pre-Hearing Interrogatories from the Council dated
  October 30, 2007.
- 4. Applicant's Responses to Pre-Hearing Interrogatories.
- 5. Comments from the Town of Sterling dated July 16, 2007.
- 6. Revised photosimulations submitted on November 29, 2007, showing a low-profile antenna platform as proposed in the Application and an arrow on each existing view photograph showing the location of the balloon.
- 7. Revised Sheet A02 showing the surveyed location of wetland flags proximate to the proposed cell site.

### C. Administrative Notice Items To Be Offered

1. Findings of Fact, Opinion and Decision and Order in Council Docket No. 216.

MCF and Cellco reserve the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

MCF COMMUNICATIONS bg, INC. and CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

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Its Attorneys